

JESUS ESCOCHEA,) 2:16-cv-00271 JFW (JEMx)
) <i>[Assigned to the Hon. John F. Walter,</i>
PLAINTIFF,) <i>Courtroom 16]</i>
)
vs.) JOINT STATEMENT OF PARTIES
) REGARDING LOCAL RULE 7-3
THE COUNTY OF LOS ANGELES;) CONFERENCE PER COURT'S
RONALD VALDIVIA, in his) STANDING ORDER 5(b)
individual and official capacity;)
STEVE COOLEY, in his official)
capacity; JACKIE LACEY, in her) Complaint Filed: 1/13/16
official capacity; KEITH)
KAUFFMAN, in his individual and) Trial Date: None
official capacity; and THE CITY OF)
HAWTHORNE,)
)
Defendants.)

///

1 PLEASE TAKE NOTICE that Defendants COUNTY OF LOS ANGELES
2 (erroneously sued as THE COUNTY OF LOS ANGELES) ("COUNTY") and
3 RONALD VALDIVIA ("VALDIVIA") (hereinafter collectively, "COUNTY
4 DEFENDANTS") hereby submit the following Joint Statement of Parties in
5 connection with Local Rule 7-3 and this Court's Standing Order 5(b) for the above
6 referenced matter:

7 1. On February 24, 2016 at 10:00 a.m., Counsel for COUNTY
8 DEFENDANTS, Tomas A. Guterres, Esq. and Lisa L. Peterson, Esq., and Counsel
9 for Plaintiff JESUS ESCOCHEA ("PLAINTIFF"), Thomas M. Ferlauto, Esq. met
10 and conferred via telephone pursuant to Local Rule 7-3 and this Court's Standing
11 Order 5(b). The duration of the teleconference was approximately 22 minutes.

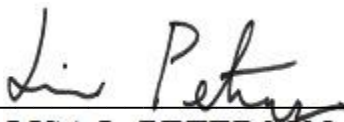
12 2. Counsel for COUNTY DEFENDANTS and PLAINTIFF discussed the
13 issues detailed in the correspondence dated February 16, 2016 from Counsel for
14 COUNTY DEFENDANTS. A copy of the correspondence is attached hereto as
15 Exhibit A.

16 3. Mr. Ferlauto advised that it is PLAINTIFF's position that none of the
17 immunities set forth in Exhibit A apply, and as such, none of the causes of action are
18 barred.

19 4. As such, the Parties were unable to resolve the issues set forth in Exhibit
20 A, which are the bases for COUNTY DEFENDANTS' Motion to Dismiss.

21
22 DATED: February 24, 2016

COLLINS COLLINS MUIR + STEWART LLP

23
24 By: 
25 LISA L. PETERSON
26 TOMAS A. GUTERRES
27 Attorneys for Defendants,
28 COUNTY OF LOS ANGELES and
RONALD VALDIVIA

PROOF OF SERVICE
(CCP §§ 1013(a) and 2015.5; FRCP 5)

State of California,)
) ss.
County of Orange.)

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action. My business address is 750 The City Drive, Suite 400, Orange, California 92868.

On this date, I served the foregoing document described as **JOINT STATEMENT OF PARTIES REGARDING LOCAL RULE 7-3 CONFERENCE PER COURT'S STANDING ORDER 5(b)** on the interested parties in this action by placing same in a sealed envelope, addressed as follows:

Thomas M. Ferlauto, Esq.
THE LAW OFFICE OF THOMAS M. FERLAUTO, APC
8 Whatney Avenue, Suite 101
Irvine, CA 92618
(949) 334-8650 – FAX: (949) 334-8691
TMF@lawofficeTMF.com
Attorneys for Plaintiff, JESUS ESCOCHEA

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Steven H. Taylor, Esq.
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Los Angeles, CA 90071
(213) 689-2500 – FAX: (213) 689-2501
dmccune@mccuneharber.com
staylor@mccuneharber.com
Attorneys for Defendants, CITY OF HAWTHORNE and
KEITH KAUFFMAN

- ☐ **(BY MAIL)** - I caused such envelope(s) with postage thereon fully prepaid to be placed in the United States mail in Orange, California to be served on the parties as indicated on the attached service list. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice, it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at: Orange, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.
- ☐ **(BY CERTIFIED MAIL)** - I caused such envelope(s) with postage thereon fully prepaid via Certified Mail Return Receipt Requested to be placed in the United States Mail in Orange, California.
- ☐ **BY EXPRESS MAIL OR ANOTHER METHOD OF DELIVERY PROVIDING FOR OVERNIGHT DELIVERY**
- ☒ **(BY ELECTRONIC FILING AND/OR SERVICE)** - I served a true copy, with all exhibits, electronically on designated recipients listed on the attached Service List on: 2/24/16 (Date) at _____ (Time)
- ☐ **FEDERAL EXPRESS** - I caused the envelope to be delivered to an authorized courier or driver authorized to receive documents with delivery fees provided for.
- ☐ **(BY FACSIMILE)** - I caused the above-described document(s) to be transmitted to the offices of the interested parties at the facsimile number(s) indicated on the attached Service List and the activity report(s) generated by facsimile number (714) 823-4101 indicated all pages were transmitted.
- ☐ **(BY PERSONAL SERVICE)** - I caused such envelope(s) to be delivered by hand to the office(s) of the addressee(s).

Executed on **February 24, 2016** at Orange, California.

- ☐ **(STATE)** - I declare under penalty of perjury under the laws of the State of California that the above is true and correct.
- ☒ **(FEDERAL)** - I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.



VIVIAN MAXWELL
viannotti@ccmslaw.com

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